

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

BOURNEWOOD HOSPITAL,  Plaintiffs,  - vs -  TOMMY G. THOMPSON, SECRETARY, UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES,  Defendant.	Civil Action No. 04-10149-JLT
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**PARTIES' JOINT MOTION TO EXTEND SCHEDULE**

Plaintiff Bournemouth Hospital, by counsel, and defendant Tommy G. Thompson, Secretary of the Department of Health and Human Services, by counsel, (together, the "Parties") hereby jointly request that the Court issue a Revised Scheduling Order as set forth below, extending the timeline established in the Court's Scheduling Order dated June 23, 2004.

The Parties are engaged in settlement negotiations they believe are productive and may resolve the case without need of making some or all of the filings contemplated by the schedule described below.

The Parties propose that the Court issue an order revising the previously ordered briefing and conference schedule as follows:

November 19, 2004:	Plaintiff's Motion for Summary Judgment
January 9, 2005:	Defendant's Opposition/ Cross-Motion
February 6, 2005:	Plaintiff's Opposition/ Reply
March 12, 2005:	Defendant's Reply

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March 21, 2005: 10:00 a.m. Status Conference

For the foregoing reasons, the Parties respectfully request that the Court issue a briefing schedule in the form set forth above.

Respectfully submitted,

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